

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA

VS.

CASE NO: 2:07cr282-WKW

VERONICA BARNES

REQUEST FOR DETENTION HEARING

Ms. Barnes by and through her attorney request that this Court conduct a detention hearing to see under what circumstances conditions may be fashioned so that she may be released to return to her family in Arizona and states in support thereof as follows:

1. Ms. Barnes is not charged with a crime of violence and there is no hint of any violence in her background or in her alleged involvement in this case.
2. Ms. Barnes has two small children. They are ages 2 and 1. They are currently with her fiancé, their father, but they need their mother.
3. The law enforcement offices involved in this matter from DEA do not object to Ms. Barnes being released, noting that it might be in her best interest.
4. Ms. Clark Morris of the US Attorney's Office, the prosecutor in this case does not object to Ms. Barnes being released.
5. The Pre-Trial Release investigations in both Arizona and Alabama has noted that there are combinations wherein Ms. Barnes could be released.
6. Numerous individuals from Ms. Barnes' hometown have written Judge Coody in support of the release of Ms. Barnes, all noting that she is not a danger or threat to run.

Wherefore Ms. Barnes requests the following relief:

1. That a hearing be conducted to determine if Ms. Barnes may be released pending trial, pleading guilty and/or sentencing.
2. All other appropriate relief.

RESPECTFULLY SUBMITTED,

s/James R. Cooper, Jr.
James R. Cooper, Jr. (COO021)
COOPER & COOPER
312 Scott Street
Montgomery, Alabama 36104
(334) 262-4887
(334) 262-4880 (Facsimile)

CERTIFICATE OF SERVICE

I hereby certify that on this the 30th day of July, 2008, I have served a copy of the foregoing Motion for Detention Hearing Upon Clark Morris, Asst. USA , at the last known address of: 136 Clayton Street, Montgomery, Al 36104 By placing a copy of the same in the United States Mail properly addressed and postage prepaid and by efilng.

s/James R. Cooper, Jr.
JAMES R. COOPER, JR.

Cc:
Veronica Barnes
Federal Inmate
Autauga County Jail
Prattville, Al